

## **DEFENDANT’S RENEWED MOTION TO COMPEL RETURN INSTRUCTIONS FROM NON-PARTY QBE**

Pursuant to Rule 7(b) of the Federal Rules of Civil Procedure and the Court’s inherent authority to safeguard sensitive data and ensure proper enterprise asset handling, Defendant Albert Rojas, appearing pro se, respectfully renews his request for an order compelling non-party QBE Insurance Group Limited (“QBE”) to issue return instructions or a FedEx shipping label for a corporate laptop QBE provided during a prior engagement.

Despite repeated requests dating back to December 2024, QBE has failed to provide any return mechanism—this, despite instructions from its counsel, Julie Anderson, directing all further communications to her. The laptop remains securely isolated in Defendant’s possession solely due to QBE’s continued inaction.

This prolonged delay raises compliance risks and undermines basic asset governance, especially given that the device may contain infrastructure credentials or personally identifiable information (PII) belonging to QBE. QBE’s inaction not only contradicts responsible corporate practices but also bears on issues of audit integrity and whistleblower disclosures addressed in Docket 59.

## **RELIEF REQUESTED**

Defendant respectfully requests that the Court:

1. Direct QBE to provide a FedEx (or equivalent) return label and return instructions within seven (7) calendar days of the Court’s order; or
2. In the alternative, require QBE to appear and show cause for its continued failure to facilitate return of the device; and
3. Grant any further relief the Court deems just and proper to ensure secure and documented return of QBE-controlled assets.

**Respectfully submitted,**

Dated: May 6, 2025

Albert Rojas

Pro Se Defendant

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(646) 866-1669

## **Certificate of Service**

I hereby certify that on May 6, 2025, a copy of the foregoing motion was served via email to:

- Julie Anderson, Esq. (Counsel for QBE) – Julie.Anderson@qbe.com
- Kimberly Karseboom, Esq. (Counsel for Plaintiff)

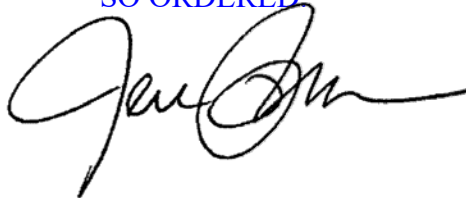
- Pro Se Clerk – ProSe@nysd.uscourts.gov
- Hon. Jesse M. Furman – Furman\_NYSDChambers@nysd.uscourts.gov

The Court presumes that Defendant submitted this document and the documents docketed at ECF Nos. 71, 72, 74, 75, and 76 before yesterday's conference, even though they were not docketed until after, as they were mooted by the conference. The Court reminds Defendant that he should refrain from filing duplicative documents - i.e., he should file only one response where a response was called for and one application where he is making an application.

Plaintiff shall promptly serve a copy of this endorsed document on Defendant by email and docket proof of such service.

The Clerk of Court is directed to terminate ECF Nos. 74, 75, and 77 and to add a "pro se" flag to the docket in this matter insofar as Defendant is proceeding without counsel.

SO ORDERED

A handwritten signature in black ink, appearing to read "Jesse M. Furman", written over the "SO ORDERED" text.

May 7, 2025